

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LUXOTTICA GROUP S.p.A.  
and OAKLEY, INC.,

Plaintiffs,

v.

THE PARTNERSHIPS and  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A,"

Defendants.

Case No. 16-cv-02570

**Judge Gary Feinerman**

**Magistrate Judge Michael T. Mason**

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiffs Luxottica Group S.p.A. and Oakley, Inc. (together, "Plaintiffs") file this Motion requesting leave to file the following documents under seal: (1) Plaintiffs' Amended Complaint which identifies domain name registration information for the Defendant Domain Names and lists the Online Marketplace Accounts; (2) Schedule A attached to the Complaint and Amended Complaint, which includes a list of the Defendant Domain Names, domain name registration information, and Online Marketplace Accounts; and (3) screenshot printouts showing the active Defendant Internet Stores and WHOIS information for the Defendant Domain Names (Exhibits 5 and 6 to the Declaration of John J. Stewart). In this action, Plaintiffs are requesting temporary *ex parte* relief based on an action for trademark counterfeiting and cybersquatting.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which

would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiffs will move to unseal these documents.

Dated this 25<sup>th</sup> day of February 2016.

Respectfully submitted,

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